

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

In re:	§	Case No. 15-40248-BR-11
	§	Chapter 11
GTL (USA), INC.,	§	
	§	Hearing Date & Time:
Debtor.	§	August 19, 2015 at 3:30 p.m.

**DEBTOR'S FIRST AMENDED WITNESS AND EXHIBIT LIST
FOR HEARINGS SCHEDULED FOR AUGUST 19, 2015 AT 3:30 P.M.**

GTL (USA), Inc., the debtor and debtor in possession (the "Debtor") files this First Amended Witness and Exhibit List with respect to the hearings scheduled for **August 19, 2015 at 3:30 p.m.** and all continuances thereof and respectfully states as follows:

WITNESSES

The Debtor may call any one or more of the following witnesses:

1. Urmeet Juneja;
2. Rajiv Kamat;
3. Dawn Ragan;
4. Richard Feferman;
5. Kunal Kapai;
6. Any witnesses called or designated by any other party in this action; and
7. Any witnesses necessary to rebut (i) the testimony of any witness designated by any other party or (ii) any evidence presented or designated by any other party.

EXHIBITS

Movant may offer the following documents at hearing:

DEBTOR HEARING EXHIBITS				
Exhibit #	Description	Dkt No.	Off.	Adm.
1	Debtor's First Amended (Revised) Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code dated August 5, 2015	272		
2	First Amended (Revised) Disclosure Statement with Respect to First Amended Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code Proposed by GTL (USA), Inc. dated August 5, 2015	273		
3	Solicitation Materials	273-1		
4	Certificate of Service of Plan Solicitation Materials	289		
5	Balloting Report (Ballots omitted from Exhibit copy, but will be present in Courtroom)	295		
6	Plan Support Agreements			
7	EIHL Commitment [not received as of 8/19/15 5:30 a.m.]			
8	Schedules	21		
9	Statement of Financial Affairs	22		
10	Adversary Complaint in <i>GTL (USA), Inc. v. Kunal Kapai and Candace Plank</i> , Case No. 15-4046	140		
11	Kapai v. GTL International, Ltd, et al. Case No. DC-15-06949, Dallas County, Texas (Ex. F to Exhibit 14)			
12	Kapai Motion to Abstain (Ex. D to Exhibit 14)	Adv. 5		
13	Kapai Original Answer, Counterclaim and Third- Party Claim (Ex. E to Exhibit 14)	Adv. 6		

DEBTOR HEARING EXHIBITS				
Exhibit #	Description	Dkt No.	Off.	Adm.
14	Expedited Motion for Order to Show Cause Why Kunal Kapai Should Not Be Held in Contempt [Exhibits Omitted as separately listed]	270		
15	Amended Expedited Motion for Order to Show Cause Kunal Should Not Be Held in Contempt [Exhibits Omitted as separately listed]	284		
16	Wage Claim filed by Kapai with Texas Workforce Commission (Ex. A to Exhibit 14)			
17	Texas Workforce Commission Wage Determination Order (Ex. B to Exhibit 14)			
18	Subpoena to Kunal Kapai and Proof of Service	291		
19	[Reserved]			
20	Proof of Claim – Kunal Kapai (Ex. C to Exhibit 14)	Claim No. 5		
21	Urmeet Juneja's Motion to Transfer Venue and Motion to Dismiss (Ex. G to Exhibit 14)			
22	Kapai's Objection to Proof of Claim of Urmeet Juneja (Ex. H to Exhibit 14)	269		
23	Assignment of Claims between Michael Bascom and GTL (USA), Inc. (Ex. I to Exhibit 14)			
24	Kapai's Brief in Support of Motion to Remand (Ex. H to Exhibit 14)			
25	Motion for Order Directing Rule 2004 Examination of Kunal Kapai (Ex. A to Exhibit 14 & 15)	43		
26	Kapai Travel Documents (Ex. B to Exhibit 15)			
27	Bank Records Reflecting Unauthorized Withdrawals by Kapai (Ex. C to Exhibit 15)			
28	Corporate Documents of SCSS LLC (Ex. D to Exhibit 15)			

The Debtor reserves the right to offer into evidence any exhibit designated on the witness and exhibit list of any other party. The Debtor reserves the right to offer into evidence any motion or other document filed or order entered as well as any exhibit to any motion or other document filed or entered in this contested matter. The Debtor reserves the right to supplement this Witness and Exhibit List. The Debtor will provide supplemental copies of any of the attached upon request.

Respectfully submitted,

Dated: August 19, 2015

CULHANE MEADOWS, PLLC

By: /s/ Lynnette Warman

Lynnette Warman

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ATTORNEYS FOR
DEBTOR IN POSSESSION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has transmitted a true and correct copy of the foregoing via the Court's Electronic Case Filing system to all persons participating therein on August 19, 2015.

/s/ Richard Grant

Richard G. Grant